**Order Type:** 

1660 Agreed Order

**Findings Order Justification:** 

N/A

**Media:** 

MLM - IHW, MSW, WQ

**Small Business:** 

No

**Location(s) Where Violation(s) Occurred:** 

Baker Hughes Oilfield Alice Pressure Pumping, 2001 Harkins, Alice, Jim Wells County

**Type of Operation:** 

Facility that provides services for the oil and gas exploration industry

**Other Significant Matters:** 

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: February 28, 2014

Comments Received: No

# Penalty Information

**Total Penalty Assessed:** \$8,625

**Amount Deferred for Expedited Settlement:** \$1,724 **Amount Deferred for Financial Inability to Pay:** \$0

**Total Paid to General Revenue:** \$6,901 **Total Due to General Revenue:** \$0

Payment Plan: N/A **SEP Conditional Offset:** \$0

Name of SEP: N/A

**Compliance History Classifications:** 

Person/CN - High Site/RN - High

Major Source: No

Statutory Limit Adjustment: N/A

**Applicable Penalty Policy:** September 2011

## **Investigation Information**

Complaint Date(s): N/A

**Complaint Information**: N/A

Date(s) of Investigation: May 31, 2013 Date(s) of NOE(s): August 28, 2013

## Violation Information

- 1. Failed to provide notice to the Executive Director ("ED") in writing or using electronic notification software provided by the ED, of any such changes or additional information to that reported previously within 90 days of the occurrence of such change or of becoming aware of such additional information. Specifically, the Notice of Registration ("NOR") primary contact, company name, site name, owner name, and billing contact were in need of updating. Additionally, the hazardous waste streams were missing from the NOR, solid waste management units managing hazardous waste were listed active when inactive or were completely missing, and the units listed did not reflect the waste actively managed in the units [30 Tex. Admin. Code § 335.6(c)].
- 2. Failed to keep records of all hazardous and industrial solid waste activities regarding the quantities generated, stored, processed, and disposed of on-site or shipped off-site for storage, processing, or disposal. Specifically, the Respondent failed to maintain the quantity of waste generated; the quantity of waste held in on-site storage as of December 31st of each year; the method of storage, processing, or disposal; and the quantity of waste shipped off-site for storage, processing, or disposal for each calendar year, including the name, address, and location of each off-site facility and transporter receiving the shipments [30 Tex. Admin. Code § 335.9(a)(1)].
- 3. Failed to sign and certify the Storm Water Pollution Prevention Plan ("SWP3") [30 Tex. Admin. Code § 305.125(1) and Texas Pollutant Discharge Elimination System ("TPDES") Multi-Sector General Permit No. TXR05AO55, Part III, General SWP3 Requirements, Section A.1].
- 4. Failed to conduct and certify a survey of potential non-stormwater sources within 180 days of filing a notice of intent ("NOI") [30 TEX. ADMIN. CODE § 305.125(1) and TPDES Multi-Sector General Permit No. TXR05AO55, Part III, Inspection and Certification of Non-Storm Water Discharges, Section B.1.(b)].
- 5. Failed to develop a complete drainage area site map which depicts all items listed in the TPDES General Permit. Specifically, the site map did not include stormwater outfalls observed along the north fence-line and the square footage of the Facility was not listed on the map nor was a clear scale provided to determine the approximate surface area [30 Tex. Admin. Code § 305.125(1) and TPDES Multi-Sector General Permit No. TXR05AO55, Part III, Description of Potential Pollutants and Sources, Section A.3.(d)].
- 6. Failed to implement all pollution prevention practices determined to be necessary, reasonable, and effective by the stormwater pollution prevention team and to prevent the discharge of industrial waste into or adjacent to water in the state. Specifically, an earthen berm was not present at the fueling area, there were numerous soil stains at the truck and equipment parking and storage area and the absorbent socks were degraded

and/or missing, a leaking tote was also observed in the product storage area, there were multiple spills to concrete and soils around the test pad area, and the wash bay structural controls were not present [30 Tex. Admin. Code § 305.125(1) and TPDES Multi-Sector General Permit No. TXR05AO55, Part III, Pollution Prevention Measures and Controls, Section A.4., and Tex. Water Code § 26.121(a)(2)].

- 7. Failed to document routine facility inspections. Specifically, routine inspections did not include the date and time, weather information, and any previously unidentified discharges of pollutants from the Facility [30 Tex. Admin. Code § 305.125(1) and TPDES Multi-Sector General Permit No. TXR05AO55, Part III, Routine Facility Inspections, Section B.2.(c)].
- 8. Failed to maintain and include in the SWP3 records of quarterly visual monitoring. Specifically, only the most recent quarterly visual monitoring record was available for review [30 Tex. Admin. Code § 305.125(1) and TPDES Multi-Sector General Permit No. TXR05AO55, Part III, Quarterly Visual Monitoring, Section B.3.(c)].
- 9. Failed to inspect the rain gauge a minimum of once per week and once per day during storm events [30 Tex. Admin. Code § 305.125(1) and TPDES Multi-Sector General Permit No. TXR05AO55, Part III, Qualifying Storm Events, Section D.1.(c)].
- 10. Failed to conduct the comprehensive site compliance inspection at least once each permit year [30 Tex. Admin. Code § 305.125(1) and TPDES Multi-Sector General Permit No. TXR05AO55, Part III, Annual Comprehensive Site Compliance Inspection, Section B.5.(a)].
- 11. Failed to conduct the hazardous metals monitoring prior to December 31st for each annual monitoring period. Specifically, the annual metals monitoring for calendar year 2012 was done in January 2013 [30 Tex. Admin. Code § 305.125(1) and TPDES Multi-Sector General Permit No. TXR05AO55, Part III, Discharges of Storm Water Runoff, Section C.1.(b)].
- 12. Failed to prevent the unauthorized disposal of industrial solid waste without the written authorization of the Commission. Specifically, at least 110,796 gallons (2,638 barrels) of wastewater ("dirty water", "sump pit" liquids, "gel water", and "gelled water") was generated at the Baker Hughes Alice facility and transported and disposed of by Mo-Vac Services to a Railroad Commission permitted disposal pit (Pit Permit No. P0077961C) located in Alice, Texas between 2012-2013 [30 Tex. Admin. Code § 335.4].
- 13. Failed to conduct a hazardous waste determination on the solid waste generated at the Facility pursuant to 30 Tex. Admin. Code § 335.504 (relating to Hazardous Waste Determination) [30 Tex. Admin. Code §§ 335.62 and 335.513 and 40 Code of Federal Regulations ("CFR") § 262.11].

14. Failed to label or clearly mark containers and above ground storage tanks used to store used oil with the words "Used Oil." Specifically, a storage tank in the fueling station area storing used oil was labeled "Waste Oil" [30 Tex. Admin. Code § 324.1 and 40 CFR § 279.22(c)(1)].

## Corrective Actions/Technical Requirements

## **Corrective Action(s) Completed:**

The Respondent has implemented the following corrective measures:

- a. By January 31, 2013, began collecting samples for hazardous metals monitoring;
- b. By May 31, 2013:
- i. Properly marked containers used to store used oil; and
- ii. Began maintaining and including records of quarterly visual monitoring in the SWP3.
- c. By June 21, 2013:
- i. Signed and certified the SWP3;
- ii. Developed a complete drainage area site map;
- iii. Implemented all necessary pollution prevention practices;
- iv. Began documenting routine facility inspections;
- v. Began monitoring the rain gauge a minimum of once per week and once per day during storm events; and
- vi. Began conducting the comprehensive site compliance inspections at least once each permit year.
- d. By August 1, 2013:
- i. Began maintaining records of all hazardous and industrial solid waste activities;
- ii. Conducted and certified a survey of potential non-stormwater sources; and
- iii. Ceased the unauthorized disposal of industrial solid waste generated at the Facility.

e. By August 5, 2013, conducted a hazardous waste determination on all wastes generated at the Facility and began maintaining the required documentation.

f. By September 16, 2013, provided the required updated NOR to the ED.

## **Technical Requirements:**

N/A

## Litigation Information

Date Petition(s) Filed: N/A Date Answer(s) Filed: N/A SOAH Referral Date: N/A Hearing Date(s): N/A Settlement Date: N/A

## **Contact Information**

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Larry Butler, Enforcement Division,

Enforcement Team 3, MC 169, (512) 239-2543; Candy Garrett, Enforcement Division,

MC 219, (512) 239-1456

**TCEQ SEP Coordinator**: N/A

**Respondent:** Richard Vaclavik, Vice President - U.S. Pressure Pumping, Baker Hughes Oilfield Operations, Inc., 2929 Allen Parkway, Suite 2100, Houston, Texas 77019

Richard L. Williams, President, Baker Hughes Oilfield Operations, Inc., 2929 Allen

Parkway, Suite 2100, Houston, Texas 77019

Respondent's Attorney: N/A

## Penalty Calculation Worksheet (PCW) Policy Revision 3 (September 2011) PCW Revision August 3, 2011 **Assigned** 3-Sep-2013 16-Sep-2013 **Screening** 6-Sep-2013 **EPA Due** RESPONDENT/FACILITY INFORMATION Respondent Baker Hughes Oilfield Operations, Inc. Reg. Ent. Ref. No. RN100695758 Facility/Site Region 14-Corpus Christi Major/Minor Source Minor **CASE INFORMATION** Enf./Case ID No. 47595 No. of Violations 13 Docket No. 2013-1700-MLM-E Order Type 1660 Media Program(s) Industrial and Hazardous Waste Government/Non-Profit No Multi-Media Water Quality Enf. Coordinator Jorge Ibarra, P.E. EC's Team Enforcement Team 3 Admin. Penalty \$ Limit Minimum \$0 Maximum \$25,000 Penalty Calculation Section TOTAL BASE PENALTY (Sum of violation base penalties) Subtotal 1 \$11,750 ADJUSTMENTS (+/-) TO SUBTOTAL 1 Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage. **Compliance History** -10.0% Enhancement Subtotals 2, 3, & 7 -\$1,175 Notes Reduction for High Performer classification. Culpability 0.0% Enhancement Subtotal 4 \$0 Notes The Respondent does not meet the culpability criteria. Good Faith Effort to Comply Total Adjustments Subtotal 5 \$2,744 **Economic Benefit** 0.0% Enhancement\* Subtotal 6 \$0 Total EB Amounts Capped at the Total EB \$ Amount Approx. Cost of Compliance **SUM OF SUBTOTALS 1-7** Final Subtotal \$7,831 OTHER FACTORS AS JUSTICE MAY REQUIRE Adjustment \$631 Reduces or enhances the Final Subtotal by the indicated percentage. Recommended enhancement to capture the avoided cost of compliance Notes associated with Violation Nos. 10, 11, and 12. Final Penalty Amount \$8,462 STATUTORY LIMIT ADJUSTMENT Final Assessed Penalty \$8,462

20.0%

Deferral offered for expedited settlement.

Reduction

Adjustment

-\$1,692

\$6,770

DEFERRAL

Notes

**PAYABLE PENALTY** 

Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g.

PCW

Policy Revision 3 (September 2011) PCW Revision August 3, 2011

**Respondent** Baker Hughes Oilfield Operations, Inc.

Case ID No. 47595

Reg. Ent. Reference No. RN100695758

Media [Statute] Industrial and Hazardous Waste

Enf. Coordinator Jorge Ibarra, P.E.

omponent	Number of	Enter Number Here	Adjust
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	0	0%
	Other written NOVs	0	0%
	Any agreed final enforcement orders containing a denial of liability ( <i>number of orders meeting criteria</i> )	0	0%
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission		0%
Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria)	0	0%
and Consent Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government		0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%
Address	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)		0%
	Ple	ase Enter Yes or No	
	Environmental management systems in place for one year or more	No 🕟 🚻	0%
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%
	Adjustment Per	centage (Sub	total 2)
at Violator (	Subtotal 3)		
No	Adjustment Per	centage (Sub	total 3)
liance Histo	ry Person Classification (Subtotal 7)		
High Perf	ormer Adjustment Per	centage (Sub	total 7)
liance Histo	ry Summary		
Compliance History Notes	Reduction for High Performer classification.		

Screening Date	6-Sep-2013 <b>Docket No.</b> 2013-1700-MLM-E Baker Hughes Oilfield Operations, Inc.	PCW
Case ID No.	47595	Policy Revision 3 (September 2011) PCW Revision August 3, 2011
Reg. Ent. Reference No.		
Enf. Coordinator	Industrial and Hazardous Waste Jorge Ibarra, P.E.	
Violation Number		
Rule Cite(s)	30 Tex. Admin. Code § 335.6(c)	
Violation Description	Failed to provide notice to the Executive Director in writing or using ele notification software provided by the Executive Director, of any such cha additional information to that reported previously within 90 days of the or of such change or of becoming aware of such additional information. Spetthe Notice of Registration ("NOR") primary contact, company name, site owner name, and billing contact were in need of updating. Additionall hazardous waste streams were missing from the NOR, solid waste mana units managing hazardous waste were listed active when inactive or completely missing, and the units listed did not reflect the waste actively in the units.	anges or courrence ecifically, e name, y, the gement were
	Base	Penalty \$25,000
		* *************************************
>> Environmental, Prope	ty and Human Health Matrix Harm	To Constitution of the Con
Release	Major Moderate Minor	2000
OR Actua Potentia		
>>Programmatic Matrix Falsification	Major Moderate Minor	
Tasinedati	X   Percent   5.0%	
Matrix	100% of the rule requirement was not met.	
Notes	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
<u></u>	, · · · · · · · · · · · · · · · · · · ·	+22.7E0]
	Adjustment	\$23,750
		\$1,250
Violation Events		
Number of	Violation Events Quarter Quarter Quarter State of Violation of	
Number of	Violation Events 1 98 Number of violation o	lays
	dally	
	weekly monthly monthly	
mark only one with an x	quarterly Violation Base	Penalty \$1,250
	semiannual annual	
	Single event X	
	One single event is recommended.	
Good Faith Efforts to Com	ply 10.0% Reduction	\$125
	Before NOV NOV to EDPRP/Settlement Offer	<u> </u>
	Extraordinary	
	Ordinary x  N/A (mark with x)	
	The Respondent achieved compliance by September 16	
	Notes 2013.	
	N. J. C	
	Violation S	<b>Subtotal</b> \$1,125
Economic Benefit (EB) for	this violation Statutory Limit	Test .
Estimat	ed EB Amount \$7 Violation Final Penal	ty Total \$1,081
	harmonia anatys the combando anatys the comban	
	This violation Final Assessed Penalty (adjusted for	flimits) \$1,081

Media Violation No.		Hazardous Waste	2			Percent Interest	Years of Depreciatio
						5.0	1
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	Onetime Costs	EB Amount
Item Description	No commas or \$						
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System			1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	l n/a l	\$0
Training/Sampling Remediation/Disposal				0.00	\$0 \$0	n/a n/a	<u>\$0</u> \$0
, -							\$0
Remediation/Disposal Permit Costs Other (as needed)	\$500 Estimated		e required upda	0.00 0.00 0.30 ated NC	\$0 \$0 \$7 OR to the Executive	n/a n/a n/a n/a e Director, Date rec	\$0 \$0 \$7
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs	Estimated	cost to provide th investig	e required upda ation date and t	0.00 0.00 0.30 ated NC	\$0 \$0 \$7 OR to the Executive I date is the comp	n/a n/a n/a e Director, Date rec liance date.	\$0 \$0 \$7 uired is the
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs	Estimated	cost to provide th investig	e required upda ation date and t	0.00 0.00 0.30 ated NC the fina	\$0 \$0 \$7 OR to the Executive I date is the comp	n/a n/a n/a e Director. Date rec liance date. for one-time avoid	\$0 \$0 \$7 uuired is the
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal	Estimated	cost to provide th investig	e required upda ation date and t	0.00 0.00 0.30 ated NC the fina enterin	\$0 \$0 \$7 OR to the Executive I date is the comp ng item (except	n/a n/a n/a e Director. Date rec liance date. for one-time avoid	\$0 \$0 \$7 uuired is the led costs) \$0
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel	Estimated	cost to provide th investig	e required upda ation date and t	0.00 0.30 0.30 ated NC the fina enterir 0.00 0.00	\$0 \$0 \$7 OR to the Executive I date is the comp og item (except of \$0 \$0	n/a n/a n/a n/a e Director. Date rec liance date.  for one-time avoid \$0 \$0 \$0	\$0 \$0 \$7 uuired is the led costs) \$0 \$0
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel pection/Reporting/Sampling	Estimated	cost to provide th investig	e required upda ation date and t	0.00 0.00 0.30 ated NC the fina enterir 0.00 0.00	\$0 \$0 \$7 OR to the Executive I date is the comp ng item (except 1 \$0 \$0 \$0	n/a n/a n/a n/a e Director. Date recliance date.  for one-time avoid \$0 \$0 \$0 \$0	\$0 \$0 \$7 uuired is the led costs) \$0 \$0
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel pection/Reporting/Sampling Supplies/equipment	Estimated	cost to provide th investig	e required upda ation date and t	0.00 0.30 0.30 ated NC the fina enterin 0.00 0.00 0.00	\$0 \$0 \$7 OR to the Executive I date is the comp of item (except of \$0 \$0 \$0 \$0 \$0	n/a n/a n/a n/a e Director. Date recliance date.  for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$7 juired is the led costs) \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel pection/Reporting/Sampling	Estimated	cost to provide th investig	e required upda ation date and t	0.00 0.30 0.30 ated NC the fina enterin 0.00 0.00 0.00	\$0 \$0 \$7 OR to the Executive I date is the comp of item (except of \$0 \$0 \$0 \$0 \$0	n/a n/a n/a n/a e Director. Date reciliance date.  for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$7 uuired is the led costs) \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Pection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimated	cost to provide th investig	e required upda ation date and t	0.00 0.30 0.30 ated NC the fina enterin 0.00 0.00 0.00	\$0 \$0 \$7 OR to the Executive I date is the comp of item (except of \$0 \$0 \$0 \$0 \$0	n/a n/a n/a n/a n/a e Director. Date reciliance date.  for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$7 uuired is the led costs) \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel pection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated	cost to provide th investig	e required upda ation date and t	0.00 0.00 0.30 ated NC the fina enterin 0.00 0.00 0.00 0.00	\$0 \$0 \$7 OR to the Executive I date is the comp item (except is \$0 \$0 \$0 \$0 \$0	n/a n/a n/a n/a e Director. Date reciliance date.  for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$7 uuired is the led costs) \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel pection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	Estimated	cost to provide th investig	e required upda ation date and t	0.00 0.00 0.30 ated NC the fina enterin 0.00 0.00 0.00 0.00	\$0 \$0 \$7 OR to the Executive I date is the comp item (except is \$0 \$0 \$0 \$0 \$0	n/a n/a n/a n/a n/a e Director. Date reciliance date.  for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$7 uuired is the led costs) \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Personnel Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated	cost to provide th investig	e required upda ation date and t	0.00 0.00 0.30 ated NC the fina enterin 0.00 0.00 0.00 0.00	\$0 \$0 \$7 OR to the Executive I date is the comp item (except is \$0 \$0 \$0 \$0 \$0	n/a n/a n/a n/a n/a e Director. Date reciliance date.  for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$7 uuired is the led costs) \$0 \$0 \$0 \$0 \$0

Screening Date		PCW
Respondent Case ID No.	Baker Hughes Oilfield Operations, Inc.	Policy Revision 3 (September 2011)  PCW Revision August 3, 2011
Reg. Ent. Reference No.		PCW Revision August 3, 2011
the state of the s	Industrial and Hazardous Waste	
Enf. Coordinator		
Violation Number	[[[[]]] [2] [[]] [[] [[] [[] [] [] [[] [	:
Rule Cite(s)	30 Tex. Admin. Code § 335.9(a)(1)	
Violation Description	Falled to keep records of all hazardous and industrial solid waste active regarding the quantities generated, stored, processed, and disposed of or shipped off-site for storage, processing, or disposal. Specifically, the Restailed to maintain the quantity of waste generated; the quantity of waste historage as of December 31st of each year; the method of storage, proof or disposal; and the quantity of waste shipped off-site for storage, proceed disposal for each calendar year, including the name, address, and location off-site facility and transporter receiving the shipments.	n-site or pondent neld in on ocessing, ssing, or
		Penalty \$25,000
>> Environmental, Proper	ty and Human Health Matrix	The state of the s
Release	<b>Harm</b> Major Moderate Minor	
OR Actual		•
Potential	Percent 0.0%	
>>Programmatic Matrix		
Falsification	Major Moderate Minor	
	X Percent 5.0%	
Matrix	100% of the rule requirement was not met.	
Notes	and the fact that requirements was not meet the second	
	Adjustment	\$23,750
		\$1,250
		<u> </u>
Violation Events		
Number of \	/iolation Events 1 62 Number of violation of	lavs
, named at	Table of Violation C	lays
	daily BERNOTERE	·
	weekly monthly	
mark only one	quarterly Violation Base	Penalty \$1,250
with an x	semiannual	*
	annual	
	single event x	
	One single event is recommended.	
Good Faith Efforts to Com	ply 25.0% Reduction	\$312
	Before NOV NOV to EDPRP/Settlement Offer	
	Extraordinary	
	Ordinary X	
	N/A (mark with x)	# <sup>1</sup>
	Notes The Respondent achieved compliance by August 1, 2013.	
	Landan and the second	
	Violation S	Subtotal \$938
Economic Benefit (EB) for	this violation Statutory Limit	Tect
-continue beneate (LD) 101	And residuon Statutory Ellille	
Estimate	ed EB Amount \$2 Violation Final Penal	lty Total \$879
	This violation Sinal Assessed Bonalty (adjusted for	r limits) \$879
	This violation Final Assessed Penalty (adjusted for	, minta) \$0/9

Media Violation No.		Hazardous Waste				Percent Interest	Years of Depreciation
						5.0	1!
Item Description			Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
, tem vescription	NO COMMAS OF P					(Pakur Magagar (CC) arti Crasipan (C	
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$200	31-May-2013	1-Aug-2013	0.17	\$2	n/a	\$2
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs		11 11		0.00	\$0	l n/a	\$0
		<u> </u>					
Other (as needed)	Estimated co	st to maintain rec	ords of all haza	0.00	\$0	n/a	\$0
		the invest	gation date an	0.00 rdous a d the fir	\$0 and industrial solid nal date is the con ng item (except	n/a waste activities. D pliance date. for one-time avoid	\$0 ate required is ded costs)
Other (as needed)  Notes for DELAYED costs  Avoided Costs		the invest	gation date an	0.00 rdous a d the fi	\$0 and industrial solid nal date is the con	n/a waste activities. D opliance date.	\$0 ate required is
Other (as needed)  Notes for DELAYED costs  Avoided Costs  Disposal Personnel		the invest	gation date an	0.00 rdous a d the fir enterin	\$0 and industrial solid nal date is the con ng item (except \$0	waste activities. Dipliance date.  for one-time avoid	\$0 ate required is ded costs) \$0
Other (as needed)  Notes for DELAYED costs  Avoided Costs  Disposal		the invest	gation date an	rdous a d the file	\$0 and industrial solid nal date is the con ng item (except \$0 \$0	waste activities. Displiance date.  for one-time avoid \$0 \$0	\$0 ate required is  ded costs) \$0 \$0
Other (as needed)  Notes for DELAYED costs  Avoided Costs  Disposal Personnel spection/Reporting/Sampling		the invest	gation date an	0.00 rdous a d the fil enterir 0.00 0.00 0.00	\$0 and industrial solid hal date is the con ag item (except   \$0 \$0 \$0 \$0	waste activities. Displiance date.  for one-time avoid \$0 \$0 \$0 \$0	\$0 ate required is ded costs) \$0 \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  Avoided Costs  Disposal  Personnel  spection/Reporting/Sampling Supplies/equipment		the invest	gation date an	0.00 rdous a d the fil enterir 0.00 0.00 0.00	\$0  and industrial solid hal date is the com  ag item (except \$0  \$0  \$0  \$0  \$0	waste activities. Depliance date.  for one-time avoid \$0 \$0 \$0 \$0 \$0	\$0 ate required is ded costs) \$0 \$0 \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  Avoided Costs  Disposal  Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2]		the invest	gation date an	enteria 0.00 enteria 0.00 0.00 0.00 0.00	\$0 and industrial solid hal date is the con ag item (except to the solid tem) \$0 \$0 \$0 \$0 \$0 \$0 \$0	waste activities. Displiance date.  for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0	\$0 ate required is ded costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0

Screening Date		PCW
Respondent Case ID No.		tion 3 (September 2011) Revision August 3, 2011
Reg. Ent. Reference No.		Kevision August 3, 2011
	Industrial and Hazardous Waste	
Enf. Coordinator		
Violation Number Rule Cite(s)		1
	30 Tex. Admin. Code § 305.125(1) and Texas Pollutant Discharge Elimination	
	System ("TPDES") Multi-Sector General Permit No. TXR05A055, Part III, General Storm Water Pollution Prevention Plan ("SWP3") Requirements, Section A.1.	
Violation Description	Failed to sign and certify the SWP3 in accordance with Part III, Section E.6.(c).	
	Base Penalty	\$25,000
rear element in nonconcident conconcident conconcident conconcident and the second subsection of the second conconcident c	•	\$23,000
>> Environmental, Prope	rty and Human Health Matrix	
Release	<b>Harm</b> e Major Moderate Minor	
OR Actua		
Potentia	Percent 0.0%	
>>Programmatic Matrix		
Falsification	Major Moderate Minor	
	Percent 1.0%	
		7
Matrix	At least 70% of the rule requirement was met.	
Notes	Actions 70 % of the requirement was meta	
		: :
	Adjustment \$24,750	
		\$250
Violation Events		
Number of	Violation Events 1 21 Number of violation days	
namet of	Total of Events 1	
	daily	
	weekly	
mark only one	monthly Violation Base Penalty	\$250
with an x	semiannual Violation base Penalty	\$250
	annual w	
	single event x	
	One single event is recommended.	
Card Eath Educate A	- No	125
Good Faith Efforts to Con	nply 25.0% Reduction  Before NOV NOV to EDPRP/Settlement Offer	\$62
	Extraordinary Extraordinary	
	Ordinary x	
	N/A (mark with x)	
	Notes The Respondent achieved compliance by June 21, 2013.	
	Violation Subtotal	\$188
Economic Benefit (EB) fo	r this violation Statutory Limit Test	
Estima	ted EB Amount \$1 Violation Final Penalty Total	\$176
	•	
	This violation Final Assessed Penalty (adjusted for limits)	\$176

	<b>E</b> i	conomic	Benefit	Wo	rksheet		
Respondent		Oilfield Operation		aka a Ka		a.di.eftearrijaaggaggaggaggalisii	
Case ID No.							
eg. Ent. Reference No.	-	3					
AND THE SECOND SECTION AND ADDRESS OF THE PROPERTY OF THE PROP		Hazardous Waste					Years of
Violation No.	-	Tidzardods Waste	•			Percent Interest	Depreciation
					st, 7850 verste versie	5.0	1
	Ttom Cost	Date Required	Einal Data	Vrc	Interact Sayad	Onetime Costs	EB Amount
Item Description					Anterest Saveu	Olletime Costs	LD AINUUIL
Delayed Costs			u najarda an hittifiki k				
Equipment		T		0.00	\$0	\$0 I	\$0
Buildings				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$200	31-May-2013	21-Jun-2013	0.06	\$1		
,						n/a l	\$1
Notes for DELAYED costs		st to to sign and c	ertify the SWP3	Date compl	e required is the in liance date.	vestigation date and	I the final date
Avoided Costs		st to to sign and c	ertify the SWP3	Date compl	e required is the in liance date. ng item (except	vestigation date and	I the final date
Avoided Costs		st to to sign and c	ertify the SWP3	Date complementering	required is the in liance date. ng item (except	vestigation date and for one-time avoid	I the final date  Ied costs)
Avoided Costs Disposal Personnel		st to to sign and c	ertify the SWP3	enterir	required is the in liance date. ng item (except \$0 \$0	vestigation date and for one-time avoid \$0 \$0	the final date
Avoided Costs Disposal Personnel spection/Reporting/Sampling		st to to sign and c	ertify the SWP3	enterir 0.00 0.00 0.00	required is the in liance date. ng item (except \$0 \$0 \$0 \$0	vestigation date and for one-time avoid \$0 \$0 \$0 \$0	the final date  led costs)  \$0  \$0  \$0  \$0
Avoided Costs Disposal Personnel		st to to sign and c	ertify the SWP3	enterir	required is the in liance date. ng item (except \$0 \$0	vestigation date and for one-time avoid \$0 \$0	the final date
Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/equipment		st to to sign and c	ertify the SWP3	enterir 0.00 0.00 0.00	e required is the in liance date.  ng item (except 1	vestigation date and for one-time avoic \$0 \$0 \$0 \$0 \$0	i the final date  ied costs)  \$0  \$0  \$0  \$0  \$0
Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2]		st to to sign and c	ertify the SWP3	enterir 0.00 0.00 0.00 0.00	e required is the in liance date. ng item (except 1 \$0 \$0 \$0 \$0 \$0	for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ithe final date  ied costs)  \$0  \$0  \$0  \$0  \$0
Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)		st to to sign and c	ertify the SWP3	enterir 0.00 0.00 0.00 0.00 0.00	required is the in liance date. ng item (except solution solutita solution solution solution solution solution solution solution	for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	the final date    So
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]		st to to sign and c	ertify the SWP3	enterir 0.00 0.00 0.00 0.00 0.00	required is the in liance date. ng item (except solution solutita solution solution solution solution solution solution solution	for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	the final date    So
Avoided Costs Disposal Personnel repection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)		st to to sign and c	ertify the SWP3	enterir 0.00 0.00 0.00 0.00 0.00	required is the in liance date. ng item (except solution solutita solution solution solution solution solution solution solution	for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	the final date    So
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)		st to to sign and c	ertify the SWP3	enterir 0.00 0.00 0.00 0.00 0.00	required is the in liance date. ng item (except solution solutita solution solution solution solution solution solution solution	for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	the final date    So

	ing Date 6-Sep-2013 Docket No. 2013-1700-MLM-E	PCW
	spondent Baker Hughes Oilfield Operations, Inc.	Policy Revision 3 (September 2011)
	se ID No. 47595	PCW Revision August 3, 2011
	ence No. RN100695758	
media Enf C	Statute] Industrial and Hazardous Waste prdinator Jorge Ibarra, P.E.	
	on Number 4	
ViOla	ula Cita(s)	
	30 Tex. Admin. Code § 305.125(1) and TPDES Multi-Sector General Processing TXR05AO55, Part III, Inspection and Certification of Non-Storm Water Careful Section B.1.(b)	
Violation	Failed to conduct and certify a survey of potential non-stormwater sour 180 days of filing a notice of intent ("NOI") in accordance with Part III B.1.(c).	
	Ва	se Penalty \$25,000
>> Environmen	al, Property and Human Health Matrix	
	Harm	
OR	Release Major Moderate Minor Actual	
	Potential X Percent 5.0%	
	1 ^ 1 5.0%	ك
>>Programmal	: Matrix	
	alsification Major Moderate Minor	_
	Percent 0.0%	
6		
	Human health or the environment will or could be exposed to significant amounts of p	collutants
Matrix	hich would not exceed levels that are protective of human health or environmental rec	
Notes	result of the violation.	
		ini di dina
	•	+22.750
	Adjustment	\$23,750
		\$1,250
		L
/iolation Event		
		***************************************
	Number of Violation Events 1 62 Number of violation	n days
	daily weekly	
	monthly	
	ark only one with an x Violation Ba	se Penalty \$1,250
	semiannual	-
	annual	
	single event	
	One quarterly event is recommended.	
Good Faith Effo	s to Comply 25.0% Reduction	\$312
	Before NOV NOV to EDPRP/Settlement Offer	
	Extraordinary	
	Ordinary x x	
	N/A	7
	Notes The Respondent achieved compliance by August 1, 2013.	
	Violatio	n Subtotal \$938
	Violatio	4950
conomic Bene	(EB) for this violation Statutory Limi	t Test
	Estimated EB Amount \$8 Violation Final Per	nalty Total \$879
	This violation Final Assessed Donalty (adjusted	for limits)
	This violation Final Assessed Penalty (adjusted	for limits) \$879

	E	conomic	Benefit	Wo	rksheet		
Respondent	Baker Hughes	Oilfield Operation	s, Inc.				Ad add as bar Johan Lavar Lavar
Case ID No.	47595						
Reg. Ent. Reference No.	RN100695758						
<ul> <li>I See Early 1 (1) (1) (1) (1) (1) (1) (1) (1) (1) (</li></ul>		Hazardous Waste					Years of
Violation No.	4					Percent Interest	Depreciation
						5.0	15
	Itom Cact	Nata Paguirad	Einal Nata	V	Interact Cayed	Onetime Costs	EB Amount
			, ,,,,,, Dutt		Anterest Saved	Officiallic Costs	LU AIIIUUIIL
Item Description	No commas or \$						
							1188811111111811118811188
Delayed Costs	[ <del></del>	i di anti di a		<del> </del>	1	Г	
Equipment				0.00	\$0	\$0	\$0
Buildings	<u> </u>	ļ		0.00	\$0	\$0	\$0
Other (as needed)	<del> </del>	<b> </b>		0.00	\$0	\$0	\$0
Engineering/construction		<u> </u>		0.00	\$0	\$0	\$0
Land Record Keeping System	<u> </u>			0.00	\$0 \$0	n/a	\$0
,		<b> </b>				n/a	\$0
Training/Sampling Remediation/Disposal		<b> </b>		0.00	\$0 \$0	n/a	\$0
Permit Costs		-		0.00	\$0 \$0	n/a	\$0 \$0
Other (as needed)	\$1,000	31-May-2013	1-Aug-2013	0.00	\$0 \$8	n/a n/a	\$8
Notes for DELAYED costs	Estimated co				ential non-stormw Il date is the comp	ater sources. Date liance date.	equired is the
Avoided Costs	ANNUAL	IZE [1] avoided	costs before	enteri	ng item (except	for one-time avoid	ed costs)
Disposal				0.00	\$0	\$0 T	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]	1. 1/11			0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,000		-	TOTAL		\$8

Screening Date		PCW
		on 3 (September 2011)
Case ID No. Reg. Ent. Reference No.		evision August 3, 2011
	Industrial and Hazardous Waste	
Enf. Coordinator		
Violation Number		
Rule Cite(s)	30 Tex. Admin. Code § 305.125(1) and TPDES Multi-Sector General Permit No.	
	TXR05AO55, Part III, Description of Potential Pollutants and Sources, Section A.3.(d)	
Violation Description	Failed to develop a complete drainage area site map which depicts all items listed in the TPDES General Permit. Specifically, the site map did not include stormwater outfalls observed along the north fence-line and the square footage of the Facility was not listed on the map nor was a clear scale provided to determine the approximate surface area.	
	Base Penalty	\$25,000
>> Environmental, Proper	ty and Human Health Matrix	
	Harm	1
Release OR Actual	· · · · · · · · · · · · · · · · · · ·	
Potential	L	
	<u> </u>	
>>Programmatic Matrix		
Falsification	Major Moderate Minor  x Percent 1.0%	
	x Percent 1.0%	TO THE PERSON NAMED IN THE
Makelin		
Matrix Notes	At least 70% of the rule requirement was met.	
	Harry C. C. Communication of the Communication of t	
	Adjustment \$24,750	
	-	
		\$250
Violation Events		
7101000 - 74110		
Number of \	violation Events 1 Number of violation days	
	daily daily weekly	in a constant of the constant
	monthly	THE STATE OF THE S
mark only one with an x	quarterly Violation Base Penalty	\$250
men on x	semiannual	
	annual	
	single event x	
	One single event is recommended.	
<u>L</u>		
Good Faith Efforts to Com	ply 25.0% Reduction	\$62
	Before NOV NOV to EDPRP/Settlement Offer	*
	Extraordinary	
	Ordinary x	
	N/A (mark with x)	
	Notes The Respondent achieved compliance by June 21, 2013.	
		1100
	Violation Subtotal	\$188
<b>Economic Benefit (EB) for</b>	this violation Statutory Limit Test	
Estimate	ed EB Amount \$1 Violation Final Penalty Total	\$176
	This violation Final Assessed Penalty (adjusted for limits)	\$176
		T = . V

	E	conomic	Benefit	Wo	rksheet		
Respondent	Baker Hughes	Oilfield Operation	is, Inc.	·	COLONIA DE LA PRESENTA ESCUESAR DE LA CONTRACTOR DE LA CO		
Case ID No.	47595	•	•				
Reg. Ent. Reference No.		3					
		Hazardous Waste	<b>5</b>			*****************	Years of
Violation No.			•			Percent Interest	Depreciation
Violation No.							
						5.0]	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling			***************************************	0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$500	31-May-2013	21-Jun-2013	0.06	\$1	n/a	\$1
Notes for DELAYED costs  Avoided Costs			the final dat	e is the	e compliance date.	quired is the investig	
Disposal	AITHOAL	ILL [1] avoided	costs before	0.00	\$0	\$0	\$0
Personnel		<del> </del>		0.00	\$0 \$0	\$0	\$0 \$0
Inspection/Reporting/Sampling				0.00	\$0	\$0 \$0	\$0
Supplies/equipment				0.00	\$0	\$0 \$0	\$0
Financial Assurance [2]				0.00	\$0	\$0 \$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$500			TOTAL		\$1

	ate 6-Sep-2013 Docket No. 20	13-1700-MLM-E <b>PCW</b>
	ent Baker Hughes Oilfield Operations, Inc. No. 47595	Policy Revision 3 (September 201:
Reg. Ent. Reference		PCW Revision August 3, 201
	te] Industrial and Hazardous Waste	
Ent. Coordina Violation Nur	tor Jorge Ibarra, P.E.	
Rule Cit	e(s)	
	30 Tex. Admin. Code § 305.125(1) and TPDES Multi-S TXR05AO55, Part III, Pollution Prevention Measures and Tex. Water Code § 26.121(a)(	Controls, Section A.4., and
Violation Descri	Failed to implement all pollution prevention practices do reasonable, and effective by the stormwater pollution prevent the discharge of industrial waste into or adjace and specifically, an earthen berm was not present at the numerous soil stains at the truck and equipment parkin absorbent socks were degraded and/or missing, a leaking the product storage area, there were multiple spills to the test pad area, and the wash bay structural controlled.	n prevention team and to tent to water in the state. fueling area, there were g and storage area and the ng tote was also observed in concrete and soils around
		Base Penalty \$25,00
>> Environmental, Pro	perty and Human Health Matrix	
Rel	<b>Harm</b> e <b>ase</b> Major Moderate Minor	
	ctual X	
Pot	ential Pe	ercent 5.0%
>>Programmatic Matı	ix	
Falsifica		
	Pe	ercent 0.0%
Human	nealth or the environment has been exposed to insignificant a	mounts of pollutants which
WATELY II	ceed levels that are protective of human health or environme	· · · · · · · · · · · · · · · · · · ·
Notes	the violation.	
(International Association International Int		
	Adjus	tment \$23,750
		\$1,25
Violation Events		
Numbe	r of Violation Events 1 Nu	mber of violation days
	dally	
	weekly <u>Front Haller</u>	
mark only		Violation Base Penalty \$1,25
with an	semiannual	11,23
	annual	
	Single event	
L. C.	One quarterly event is recommended.	
Good Faith Efforts to 0		\$31
	Before NOV NOV to EDPRP/Settlement Offer Extraordinary	
	Ordinary x	
	N/A (mark with x)	
		1,120,24, 2012
	Notes The Respondent achieved compliance by	June 21, 2013.
	Latinian de la latinian de latinian de latinian de latinian de latinian de latinian de la latinian de	
		Violation Subtotal \$938
Economic Benefit (EB)	for this violation	atutory Limit Test
Est	mated EB Amount \$1 Viol	ation Final Penalty Total \$879
9599899899999998988998484848	This violation Final Assessed Pen	alty (adjusted for limits) \$879

	E	conomic	Benefit	Wo	rksheet		
Respondent Case ID No.		Oilfield Operation	ns, Inc.				
Reg. Ent. Reference No.		)					
		· Hazardous Waste					
		nazaruous waste	:			<b>Percent Interest</b>	Years of
Violation No.	ь						Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	Onetime Costs	EB Amount
Item Description	No commas or \$						
	egeneration of the contract					tiga kilo dili nga maggiti da 1900 tili na magana kan T	
Delayed Costs			Madiffic (Co.)				
Equipment		T T		0.00	\$0	\$0	\$0
 Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$500	31-May-2013	21-Jun-2013	0.06	\$1	n/a	\$1
Notes for DELAYED costs  Avoided Costs		investig	ation date and t	he fina	I date is the comp	actices. Date requirely liance date.	
Disposal		TEL [1] UVOIGEU	COSES DETOTE	0.00	\$0	\$0	\$0
Personnel				0.00	<u> </u>	\$0 \$0	\$0 \$0
Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/equipment				0.00	\$0 \$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
'							

Screening Date		E	PCW
Respondent Case ID No.	Baker Hughes Oilfield Operations, Inc.	Policy Revision 3 (S	
Reg. Ent. Reference No.		PCW Revision	August 3, 2011
Media [Statute]	Industrial and Hazardous Waste		
Enf. Coordinator	Jorge Ibarra, P.E.		
Violation Number Rule Cite(s)	문학자 <b>7</b> 		
Rule Cite(s)	30 Tex. Admin. Code § 305.125(1) and TPDES Multi-Sector General TXR05AO55, Part III, Routine Facility Inspections, Section B.2		
Violation Description	Failed to document routine facility inspections. Specifically, routine ins not include the date and time, weather information, and any previously discharges of pollutants from the Facility.		
	В	Base Penalty	\$25,000
>> Environmental, Proper	ty and Human Health Matrix		
Release	<b>Harm</b> Major Moderate Minor		
OR Actual	Major Moderate Millor		
Potential	Percent 0.0	%	
>>Programmatic Matrix Falsification	Major Moderate Minor		
	x Percent 1.0	%	
Matrix			
Notes	At least 70% of the rule requirement was met.		
<u>L</u>			
	Adjustment	\$24,750	:
	,		+0.50
		<u></u>	\$250
Violation Events			
	Number of violation	on days	
1	daily		
	weekly		•
mark only one	monthly		
with an x	quarterly Violation B semiannual	ase Penalty	\$250
	annual		
	single event x		
Control of the Contro			
	One single event is recommended.		
	one single event is recommended.		
	•		
Good Faith Efforts to Com			\$62
	Before NOV NOV to EDPRP/Settlement Offer Extraordinary		
	Ordinary x		
	N/A (mark with x)		
		:	
	Notes The Respondent achieved compliance by June 21, 2013		
		_	
	Violati	on Subtotal	\$188
		***************************************	*************************
Economic Benefit (EB) for	this violation Statutory Lin	iit Test	
Estimate	d EB Amount \$1 Violation Final Pe	enalty Total	\$176
	This violation Final Assessed Penalty (adjusted	d for limits)	\$176

leg. Ent. Reference No. Media Violation No.	Industrial and	Hazardous Waste	2			Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
and the second s		- North California (California)					
Delayed Costs	_	4,724,724,744,744,744,744,744,744,744,74					
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0 \$0	\$0
Engineering/construction				0.00	\$0 \$0	\$0 n/a	\$0 \$0
Land Record Keeping System	\$200	31-May-2013	21-Jun-2013	0.00	\$0 \$1	n/a n/a	\$0 \$1
Training/Sampling	3200	31-1-194-2013	21-3011-2013	0.00	\$0	n/a	\$1 \$0
Remediation/Disposal				0.00	\$0	n/a	\$0 \$0
Permit Costs				0.00			\$0 \$0
Fertilit Costs							
Other (as needed)	Estimated co	est to begin docum	nenting routine	0.00	\$0 \$0 inspections. Date	n/a n/a required is the inve	\$0
Notes for DELAYED costs		<u>-</u>	and the final d	0.00 facility ate is t	\$0 inspections. Date the compliance date	n/ä required is the inve te.	\$0 stigation date
Notes for DELAYED costs  Avoided Costs		<u>-</u>	and the final d	0.00 facility ate is t	\$0 inspections. Date the compliance dai ng item (except	n/a required is the invete.	\$0 stigation date led costs)
Notes for DELAYED costs  Avoided Costs  Disposal		<u>-</u>	and the final d	facility ate is tentering 0.00	\$0 inspections. Date the compliance dai ng item (except \$0	required is the invete.  for one-time avoid \$0	\$0 stigation date led costs) \$0
Notes for DELAYED costs  Avoided Costs  Disposal Personnel		<u>-</u>	and the final d	o.oo facility ate is t enterin 0.00 0.00	\$0 inspections. Date the compliance dat  ng item (except \$0 \$0	required is the invete.  for one-time avoid \$0 \$0	\$0 stigation date led costs) \$0 \$0
Notes for DELAYED costs  Avoided Costs  Disposal  Personnel  aspection/Reporting/Sampling		<u>-</u>	and the final d	o.00 facility ate is t enterin 0.00 0.00 0.00	\$0 inspections. Date the compliance date the c	required is the invete.  for one-time avoid \$0 \$0 \$0 \$0	\$0 stigation date  led costs) \$0 \$0 \$0 \$0
Notes for DELAYED costs  Avoided Costs  Disposal  Personnel  nspection/Reporting/Sampling  Supplies/equipment		<u>-</u>	and the final d	0.00 facility ate is t enterin 0.00 0.00 0.00 0.00	\$0 inspections. Date the compliance date to t	required is the invete.  for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0	\$0 stigation date  led costs) \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs  Avoided Costs  Disposal  Personnel  nspection/Reporting/Sampling  Supplies/equipment  Financial Assurance [2]		<u>-</u>	and the final d	0.00 facility ate is t enterin 0.00 0.00 0.00 0.00 0.00	inspections. Date the compliance date  ng item (except   \$0   \$0   \$0   \$0   \$0   \$0   \$0   \$0	required is the invete.  for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 stigation date  fed costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs  Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/equipment		<u>-</u>	and the final d	0.00 facility ate is t enterin 0.00 0.00 0.00 0.00	\$0 inspections. Date the compliance date to t	required is the invete.  for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0	\$0 stigation date  led costs) \$0 \$0 \$0 \$0 \$0 \$0

Screening Date		***************************************
Case ID No.		Policy Revision 3 (September 2011) PCW Revision August 3, 2011
	Industrial and Hazardous Waste	
Enf. Coordinator Violation Number	Jorge Ibarra, P.E.	
Rule Cite(s)	30 Tex. Admin. Code § 305.125(1) and TPDES Multi-Sector General F TXR05AO55, Part III, Quarterly Visual Monitoring, Section B.3.	
Violation Description	Failed to maintain and include in the SWP3 records of quarterly visual in Specifically, only the most recent quarterly visual monitoring record was for review.	
	Ві	ase Penalty \$25,000
>> Environmental, Proper	ty and Human Health Matrix	
Release	Harm Major Moderate Minor	
<b>OR</b> Actual Potential	Percent 0.09	6
>>Programmatic Matrix		
Falsification	Major Moderate Minor  x Percent 5.09	67
		<u> </u>
Matrix Notes	100% of the rule requirement was not met.	
	Adjustment	\$23,750
		\$1,250
Violation Events		
	1 Number of violatio	n days
•	dally	
	weekly	
mark only one with an x	monthly quarterly Violation Ba	se Penalty \$1,250
	semiannual annual	
	single event. x ::	
	One single event is recommended.	
Good Faith Efforts to Comp	25.0% Reduction  Before NOV NOV to EDPRP/Settlement Offer	\$312
	Extraordinary	
	Ordinary         x           N/A         (mark with x)	_
	Notes The Respondent achieved compliance by May 31, 2013.	
	Violatio	n Subtotal \$938
Economic Benefit (EB) for		
Estimate	In the second se	
	This violation Final Assessed Penalty (adjusted	for limits) \$879

	E	conomic	Benefit	Wo	rksheet		
Respondent		Oilfield Operation	al libraria la cista esta del particolida i	an i i i i i i i i i i i i i i i i i i i	ina katamatan matamata		
Case ID No.	47595						
Reg. Ent. Reference No.		١.					
Media	Industrial and	Hazardous Waste	2			Percent Interest	Years of
Violation No.	8						Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	Onetime Costs	EB Amount
Item Description	No commas or \$						
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/construction				0.00	\$0	\$0	\$0
Land	31.114.4			0.00	\$0	n/a	\$0
Record Keeping System	\$200	31-May-2013	31-May-2013	0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs  Avoided Costs	[	Date required is th	ne investigation	date a	nd the final date is	ds of quarterly visua s the compliance dat for one-time avoic	e.
Disposal		LEL [1] avoided	costs before	0.00	\$0		************
Personnel	<del></del>			0.00	\$0 \$0	\$0 \$0	\$0 \$0
nspection/Reporting/Sampling				0.00	\$0 \$0	\$0	\$0 \$0
Supplies/equipment				0.00	\$0 \$0	\$0	\$0 \$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs					7-7-7-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1		
Approx. Cost of Compliance		\$200			TOTAL		\$0

	ening Date		·E	PCW
		Baker Hughes Oilfield Operations, Inc.		(September 2011)
Reg. Ent. Ref	Case ID No.		PCW Revis	ion August 3, 2011
		Industrial and Hazardous Waste		
Enf. C	Coordinator	Jorge Ibarra, P.E.		
Viola	ation Number	9 4 7		
	Rule Cite(s)	30 Tex. Admin. Code § 305.125(1) and TPDES Multi-Sector General	Permit No.	
		TXR05AO55, Part III, Qualifying Storm Events, Section D.1.(		
Violatio	n Description	Failed to inspect the rain gauge a minimum of once per week and on	ce per day	
		during storm events.		
		В	ase Penalty	\$25,000
>> <b>F</b> ====================================				
>> Elivirolimiei	itai, Propei	ty and Human Health Matrix Harm		
	Release	Major Moderate Minor		
OR	Actual			
	Potential	Percent 0.0	<u>%</u> ]	
>>Programma	tic Matrix			
—	Falsification	Major Moderate Minor		
		x Percent 1.00	%	
	<u> </u>			
Matrix Notes		At least 70% of the rule requirement was met.		
	Li			
		Adjustment	\$24,750	
			F	\$250
				\$250
<b>Violation Event</b>	S			
	81h£ )			
	Number of	violation Events 1 Number of violation	on days	approximation of the contract
		daily		
		weekly		
	mark only one	monthly		
	with an x	quarterly Violation Basemiannual Violation Basemiannual	ase Penalty	\$250
		annual		
		single event x		
ŗ				-
	i i i	One single event is recommended.	***************************************	MM110000
l	<u> </u>			William
Good Faith Effo	rts to Com	oly 25.0% Reduction		\$62
		Before NOV NOV to EDPRP/Settlement Offer Extraordinary		
		Ordinary x  N/A (mark with x)		
		M/A	1	***************************************
		Notes The Respondent achieved compliance by June 21, 2013.		
				+100
		Violatio	on Subtotal	\$188
Economic Bene	fit (EB) for	this violation Statutory Lim	iit Test	
				*****
	Estimate	d EB Amount \$1 Violation Final Pe	nalty Total	\$176
		This violation Final Assessed Penalty (adjusted	for limits)	\$176
		, contact the second se	/L	

Media		Hazardous Waste	:			Percent Interest	Years of
Violation No.	9					r encent anterest	Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	Onetime Costs	EB Amount
Item Description	No commas or \$						
5 - 202 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)			-	0.00	\$0	\$0	\$0
Engineering/construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	. \$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)	\$200 Estimated cos	31-May-2013		0.00	\$0 \$1	n/a n/a	\$0 \$1
Permit Costs Other (as needed)  Notes for DELAYED costs	Estimated cos	t to begin monitor	ing the rain ga the final dat	0.00 0.06 uge as r	\$0 \$1 required. Date re compliance date.	n/a n/a quired is the investion	\$0 \$1 gation date and
Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs	Estimated cos	t to begin monitor	ing the rain ga the final dat	0.00 0.06 uge as r e is the	\$0 \$1 required. Date re compliance date.	n/a n/a quired is the investion for one-time avoid	\$0 \$1 gation date and led costs)
Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs  Disposal	Estimated cos	t to begin monitor	ing the rain ga the final dat	0.00 0.06 uge as re is the	\$0 \$1 required. Date recompliance date.	n/a n/a quired is the investion for one-time avoid	\$0 \$1 gation date and led costs) \$0
Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel	Estimated cos	t to begin monitor	ing the rain ga the final dat	0.00 0.06 uge as re is the	\$0 \$1 required. Date re compliance date. g item (except ) \$0 \$0	n/a n/a n/a quired is the investion for one-time avoid \$0 \$0 \$0	\$0 \$1 gation date and led costs) \$0 \$0
Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs  Disposal Personnel spection/Reporting/Sampling	Estimated cos	t to begin monitor	ing the rain ga the final dat	0.00 0.06 uge as ree is the enterin 0.00 0.00 0.00	\$0 \$1 required. Date re- compliance date. gitem (except) \$0 \$0 \$0	n/a n/a n/a quired is the investion for one-time avoid \$0 \$0 \$0 \$0	\$0 \$1 gation date and led costs) \$0 \$0 \$0
Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/equipment	Estimated cos	t to begin monitor	ing the rain ga the final dat	0.00 0.06 uge as ree is the enterin 0.00 0.00 0.00	\$0 \$1 required. Date re compliance date. g item (except   \$0 \$0 \$0 \$0	n/a n/a n/a quired is the investion for one-time avoid \$0 \$0 \$0 \$0 \$0	\$0 \$1 gation date and led costs) \$0 \$0 \$0 \$0
Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimated cos	t to begin monitor	ing the rain ga the final dat	0.00 0.06 uge as ree is the	\$0 \$1 required. Date recompliance date. gitem (except solution sol	n/a n/a n/a quired is the investig  for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$1 gation date and led costs) \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/equipment	Estimated cos	t to begin monitor	ing the rain ga the final dat	0.00 0.06 uge as ree is the enterin 0.00 0.00 0.00	\$0 \$1 required. Date re compliance date. g item (except   \$0 \$0 \$0 \$0	n/a n/a n/a quired is the investion for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$1 gation date and led costs) \$0 \$0 \$0 \$0

S	creening Date		1700-MLM-E PCW
		Baker Hughes Oilfield Operations, Inc.	Policy Revision 3 (September 2011)
Dog Est	Case ID No.		PCW Revision August 3, 2011
	Reference No.		
IVI Er	edia [Statute] if. Coordinator	Industrial and Hazardous Waste	
	Violation Number	10	
	Rule Cite(s)		
	Ruic Cite(3)	30 Tex. Admin. Code § 305.125(1) and TPDES Multi-Secto	
		TXR05AO55, Part III, Annual Comprehensive Site Compliance	ce Inspection, Section
		B.5.(a)	
Viol	ation Description	Failed to conduct the comprehensive site compliance inspect	ion at least once each
		permit year.	
			Base Penalty \$25,000
>> Environ	mental, Propei	y and Human Health Matrix	
		Harm	
OR	Release	Major Moderate Minor	
UK	Actual		
	Potential	Percen	nt 5.0%
>>Program	matic Matrix		
	Falsification	Major Moderate Minor	
		Percen	nt 0.0%
	Buman baa	h or the environment will or sould be expected to significant a	
Mat	which would r	h or the environment will or could be exposed to significant a it exceed levels that are protective of human health or enviror	nmental recentors as a
Not	es   ""	result of the violation.	interital receptors as a
		N 2011 LLCC	422.750
		Adjustmer	nt \$23,750
			\$1,250
			£
Violation Ev	ents		
	Number of \	olation Events 1 142 Number	r of violation days
	!	daily	4
		weekly	
		monthly	
	mark only one		olation Base Penalty \$1,250
	with an x	semiannual	71/230
		annual X	•
		single event	
		According to the second	
		One annual event is recommended.	
^	Efforts to Com	n= ov]e	+040
avva raidi i	anorts to Comp	· <del></del>	\$312
		Before NOV NOV to EDPRP/Settlement Offer extraordinary	
		Ordinary x (mark with x)	**************************************
		IV/A	
		Notes The Respondent achieved compliance by June	21 2012
		Troces The respondent admirate compliance by Julie	
			<del></del>
			Violation Subtotal \$938
			<u> </u>
conomic Be	enefit (EB) for	his violation Statut	ory Limit Test
	Estimate	I EB Amount \$247 Violation	1 Final Penalty Total \$879
		This violation Final Assessed Penalty (	(adjusted for limits) \$879
		inis violation Filiai Assesseu Pellaity (	aujusteu ioi iiiiits) \$879

Violation No.	10	Hazardous Waste				Percent Interest	Years of Depreciation
Item Description		Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Delayed Costs							
Equipment		T		0.00	\$0	\$0	\$0
Buildings		1		0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
	1						
Notes for DELAYED costs  Avoided Costs	ANNUAL	IZE [1] avoided	costs before	enterir	ng item (except	for one-time avoid	led costs)
	ANNUAL	IZE [1] avoided	costs before	enterir 0.00	ng item (except	for one-time avoid	
Avoided Costs	ANNUAL	IZE [1] avoided	costs before				led costs) \$0 \$0
Avoided Costs Disposal Personnel	*500	IZE [1] avoided	costs before	0.00	\$0	\$0	\$0
Avoided Costs Disposal Personnel spection/Reporting/Sampling				0.00 0.00 0.47	\$0 \$0 \$12	\$0 \$0 \$236	\$0 \$0 \$247
Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/equipment				0.00 0.00 0.47 0.00	\$0 \$0 \$12 \$0	\$0 \$0 \$236 \$0	\$0 \$0 \$247 \$0
Avoided Costs Disposal Personnel pection/Reporting/Sampling				0.00 0.00 0.47	\$0 \$0 \$12	\$0 \$0 \$236	\$0 \$0 \$247
Avoided Costs Disposal Personnel Dection/Reporting/Sampling Supplies/equipment				0.00 0.00 0.47 0.00	\$0 \$0 \$12 \$0	\$0 \$0 \$236 \$0	\$0 \$0 \$247 \$0

Screening Date	· Control of the Cont	PCW
Respondent Case ID No.		Policy Revision 3 (September 2011)
Reg. Ent. Reference No.		PCW Revision August 3, 2011
	Industrial and Hazardous Waste	
Enf. Coordinator		
Violation Number	11	arrene and a second
Rule Cite(s)	30 Tex. Admin. Code § 305.125(1) and TPDES Multi-Sector General Perr	nit No.
rozona	TXR05AO55, Part III, Discharges of Storm Water Runoff, Section C.1.	.(b)
The discourage		
Violetian Description	Failed to conduct the hazardous metals monitoring prior to December 31st	
Violation Description	annual monitoring period. Specifically, the annual metals monitoring for c year 2012 was done in January 2013.	alendar
Annual		
	Rase	Penalty \$25,000
	Dase	\$25,000
>> Environmental, Proper	ty and Human Health Matrix	
Release	Harm Major Madorato Minor	
OR Actual	Major Moderate Minor	
Potential	X Percent 5.0%	
>>Programmatic Matrix		
Falsification	Major Moderate Minor Percent 0.0%	
<u> </u>	Percent 0.0%	
	th or the environment will or could be exposed to significant amounts of poll ot exceed levels that are protective of human health or environmental recep	
Notes	result of the violation.	CO13 43 4
	Adjustment	\$23,750
	71.7.#33B7011.531.01	
		\$1,250
Violation Events		
nousen arene		
Number of N	/iolation Events 1 1 Number of violation d	ays
	daily weekly	
	monthly	
mark only one with an x	quarterly X Violation Base	Penalty \$1,250
·	semiannual	
000 A	annual	
	single event	
	One quarterly event is recommended.	
Good Faith Efforts to Com	oly 25.0% Reduction	\$312
	Before NOV NOV to EDPRP/Settlement Offer	\$312
	Extraordinary	
	Ordinary x	
	N/A (mark with x)	-
	The Respondent achieved compliance by January 31,	
	Notes 2013.	
	L SECTION SECT	
	Violation S	Subtotal \$938
		-
Economic Benefit (EB) for	this violation Statutory Limit 1	est
Estimate	d EB Amount \$27 Violation Final Penal	ty Total \$879
	terrane and the state of the st	-
	This violation Final Assessed Penalty (adjusted for	'limits) \$879

aker Hughes 7595 N100695758	CONOMIC Oilfield Operation  Hazardous Waste	s, Inc.			Medili i i i i i i i i i i i i i i i i i i	
7595 N100695758 ndustrial and	· 3	•				
N100695758 ndustrial and						
ndustrial and						
					<b>F</b>	Years of
· <del>**</del> * 1	Tidzai dods Waste				Percent Interest	Depreciation
					5.0	15
Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
to commas or \$						
1, 11-1-1-1			0.00	\$0	I \$0 1	\$0
			0.00	\$0	\$0	\$0
			0.00	\$0	\$0	\$0
::::::::::::::::::::::::::::::::::::			0.00	\$0	\$0	\$0
			0.00	\$0	n/a	\$0
			0.00	\$0	n/a	\$0
			0.00	\$0	n/a	\$0
			0.00	\$0	n/a	\$0
			0.00	\$0	n/a n/a	\$0
ANNUAL	IZE [1] avoided	costs before	0.00 0.00	\$0 \$0	n/a	\$0 \$0
ANNUAL	IZE [1] avoided	costs before	0.00 0.00	\$0 \$0	n/a n/a n/a for one-time avoid	\$0 \$0
ANNUAL	IZE [1] avoided	costs before o	0.00 0.00	\$0 \$0	n/a n/a	\$0 \$0
ANNUAL \$300	IZE [1] avoided	costs before of	0.00 0.00 enterir	\$0 \$0 ng item (except	n/a n/a for one-time avoid	\$0 \$0 led costs)
			0.00 0.00 enterir 0.00 0.00	\$0 \$0 ng item (except \$0 \$0	n/a n/a for one-time avoid	\$0 \$0 <b>led costs)</b> \$0 \$0
			0.00 0.00 enterin 0.00 0.00 0.08	\$0 \$0 ng item (except \$0 \$0 \$1	n/a n/a for one-time avoid \$0 \$0 \$25	\$0 \$0 \$0 <b>sed costs)</b> \$0 \$0 \$27
			0.00 0.00 0.00 enterir 0.00 0.00 0.08 0.00	\$0 \$0 ***  ***  ***  ***  ***  ***  ***	n/a n/a for one-time avoid \$0 \$0 \$25 \$0	\$0 \$0 <b>fed costs)</b> \$0 \$0 \$27 \$0
		lo commas or \$	그러워 그는 그들이 아무지 않는 얼마나라는 이 사람들은 사람들은 사람들이 모든 사람들이 되었다.	0.00	0.00 \$0	0.00 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$

		6-Sep-2013 <b>Docket No.</b> 2013-1700-MLM-	·E PCW
cuse	ondent ID No.	Baker Hughes Oilfield Operations, Inc.	Policy Revision 3 (September 201
Reg. Ent. Referei		** * * *	PCW Revision August 3, 20
Media [S	Statute]	Industrial and Hazardous Waste	
Enf. Coor	15	Jorge Ibarra, P.E.	
Rule	V12 le Cite(s)	12	
		30 Tex. Admin. Code § 335.4	
Violation De	scription	Failed to prevent the unauthorized disposal of industrial solid waste v written authorization of the Commission, as documented during the ir conducted on May 31, 2013. Specifically, at least 110,796 gallons (2,6: wastewater ("dirty water", "sump pit" liquids, "gel water", and "gelled generated at the Baker Hughes Alice facility and transported and dispos Vac Services to a Railroad Commission permitted disposal pit (RRC Pit P0077961C) located in Alice, Texas between 2012-2013.	nvestigation 38 barrels) of water") was sed of by Mo-
	•		sase Penalty \$25,00
> Environmental,	, Properi	ry and Human Health Matrix Harm	
	Release	Major Moderate Minor	
OR	Actual	A TABLE X	
	Potential	Percent 5.0	<u>%</u>
>Programmatic M	Matrix		
Fals	Isification	Major Moderate Minor	
<u> </u>		Percent 0.0	<u>%</u> ]
Hum	nan hoalth	by the environment had been evered to indentificant and the distillation	
Matrix not	exceed lev	or the environment has been exposed to insignificant amounts of polluta els that are protective of human health or environmental receptors as a	result of the
Notes		violation.	
L			
		Adjustment	\$23,750
			\$1,25
<u></u>			
olation Events			
Nu	umber of V	iolation Events 1 62 Number of violation	on davs
	_		
		daily	
		weekly monthly	
	rk only one vith an x		ase Penalty \$1,25
***	TOT LIK X	semiannual	- L
		annual Single event	
	I	ange ever	
	:	One quarterly event is recommended.	
	::	One quarterly event is recommended.	
ood Faith Efforts (	to Comp		\$31
od Faith Efforts I	POLICE CONTRACTOR OF THE STATE	Iy 25.0% Reduction  Before NOV NOV to EDPRP/Settlement Offer	\$31
od Faith Efforts (	POLICE CONTRACTOR OF THE STATE	Ly 25.0% Reduction  Before NOV NOV to EDPRP/Settlement Offer  Extraordinary	\$31
ood Faith Efforts (	POLICE CONTRACTOR OF THE STATE	25.0% Reduction  Before NOV NOV to EDPRP/Settlement Offer  Extraordinary X  Ordinary X	\$31
ood Faith Efforts (	POLICE CONTRACTOR OF THE STATE	Ly 25.0% Reduction  Before NOV NOV to EDPRP/Settlement Offer  Extraordinary	\$31
ood Faith Efforts (	POLICE CONTRACTOR OF THE STATE	25.0% Reduction  Before NOV NOV to EDPRP/Settlement Offer  Extraordinary X  Ordinary X	
ood Faith Efforts (	POLICE CONTRACTOR OF THE STATE	25.0% Reduction  Before NOV NOV to EDPRP/Settlement Offer  Extraordinary X  N/A (mark with x)	
ood Faith Efforts (	POLICE CONTRACTOR OF THE STATE	25.0% Reduction  Before NOV NOV to EDPRP/Settlement Offer Extraordinary Ordinary x (mark with x)  Notes The Respondent achieved compliance by August 1, 2013	3.
		Extraordinary Ordinary N/A Notes The Respondent achieved compliance by August 1, 2013	
ood Faith Efforts (		Extraordinary Ordinary N/A Notes The Respondent achieved compliance by August 1, 2013	on Subtotal \$93
	EB) for I	Extraordinary Ordinary N/A Notes The Respondent achieved compliance by August 1, 2013  Violation  Statutory Lime	on Subtotal \$93
	EB) for I	Defore NOV NOV to EDPRP/Settlement Offer Extraordinary	on Subtotal \$93 hit Test enalty Total \$87
	EB) for I	Extraordinary Ordinary N/A Notes The Respondent achieved compliance by August 1, 2013  Violation  Statutory Lime	on Subtotal \$93 hit Test enalty Total \$87

12	Hazardous Waste					Years of
12					Percent Interest	Depreciation
					5.0	13
Item Cost No commas or \$		Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
			0.00	\$0	\$0	\$0
			0.00	\$0	\$0	\$0
			0.00	\$0	\$0	\$0
			0.00	\$0	\$0	\$0
			0.00	\$0	n/a	\$0
			0.00	\$0	n/a	\$0
			0.00	\$0	n/a	\$0
			0.00	\$0	n/a	\$0
			0.00	\$0	n/a	\$0
			0.00	\$0	n/a	\$0
				ng item (except	for one-time avoid	led costs)
\$2,000	31-May-2013	1-Aug-2013		\$17	\$340	\$357
			0.00	\$0	\$0	\$0
				\$0		\$0
			0.00	\$0	\$0	\$0
			0.00	\$0	\$0	\$0
			10.00	90	<b>\$</b> 0	<b>3</b> 0
			0.00	\$0 \$0	\$0 \$0 \$0	\$0 \$0 \$0
	No commas or \$	No commas or \$	No commas or \$  ANNUALIZE [1] avoided costs before	No commas or \$	No commas or \$	

Case ID No.	Baker Hughes Oilfield Operations, Inc.  Policy Revision 47595  PCW Revision	PCW on 3 (September 2011) evision August 3, 2011
Reg. Ent. Reference No.  Media [Statute]  Enf. Coordinator  Violation Number	Industrial and Hazardous Waste	*
Rule Cite(s)	30 Tex. Admin. Code §§ 335.62 and 335.513 and 40 Code of Federal Regulations § 262.11	
Violation Description	Failed to conduct a hazardous waste determination on the solid waste generated at the Facility pursuant to 30 Tex. Admin. Code § 335.504 (relating to Hazardous Waste Determination).	
- Control of the Cont	Base Penalty	\$25,000
>> Environmental, Propert  Release OR Actual Potential	ty and Human Health Matrix  Harm  Major Moderate Minor  x Percent 3,0%	
>>Programmatic Matrix Falsification	Major Moderate Minor Percent 0.0%	
	or the environment would or could be exposed to insignificant amounts of pollutants of exceed levels that are protective of human health or environmental receptors as a result of the violation.	
	Adjustment \$24,250	
Violation Events		\$750
Number of V	iolation Events 1 66 Number of violation days	
mark only one with an x	daily weekly monthly quarterly semiannual annual	\$750
	One single event is recommended.	
Good Faith Efforts to Comp	Before NOV NOV to EDPRP/Settlement Offer  Extraordinary	\$187
	N/A (mark with x)  Notes The Respondent achieved compliance by August 5, 2013.	Militar di unu managaman da man
	Violation Subtotal	\$563
Economic Benefit (EB) for I	this violation Statutory Limit Test  d EB Amount \$5 Violation Final Penalty Total	\$527
	This violation Final Assessed Penalty (adjusted for limits)	\$527

	E	conomic	Benefit	Wo	rksheet		
Respondent	Baker Hughes	Oilfield Operation	is, Inc.				
Case ID No.							
Reg. Ent. Reference No.	RN100695758	<b>;</b>					
		Hazardous Waste	<u>.</u>				Years of
Violation No.						Percent Interest	Depreciation
						5.0	15
	T.L.L. C.L.	Date Required	Eleal Data	V	Tatabasi Gasasi	Onetime Costs	EB Amount
	BERTHOMES CARTES I		Fillal Date	115	Interest Saveu	Oneume Costs	EB AMOUNT
Item Description	No commas or \$	Shighting 1 Sec					
erroninaria de la companya de la co	***************************************				s til e ere søres sammen søres se en er e		
Delayed Costs							
Equipment		<u> </u>		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/construction				0.00	\$0	\$0	\$0
Land		<u> </u>		0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs		<u> </u>		0.00	<u>\$0</u>	n/a	\$0
Other (as needed)	\$500	31-May-2013	5-Aug-2013	0.18	\$5	n/a	\$5
	Estimated co	st to conduct a ha	zardous waste	determ	ination on all wast	es generated at the	Facility and to
Notes for DELAYED costs						vestigation date and	
Notes for BEENTED Costs	Degin manica	ming the required			iance date.	vestigation date and	a circ iniai adec
			15 (17)	- compi	iance date.	<u> </u>	
Avoided Costs	ANNUAL	IZE [1] avoided	costs before	enterii	ng item (except	for one-time avoid	ded costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
		:					
Notes for AVOIDED costs							
	·	1					1
Approx. Cost of Compliance		\$500			TOTAL		\$5

### Penalty Calculation Worksheet (PCW) Policy Revision 3 (September 2011) PCW Revision August 3, 2011 Assigned 3-Sep-2013 Screening 6-Sep-2013 EPA Due PCW 16-Sep-2013 RESPONDENT/FACILITY INFORMATION Respondent Baker Hughes Oilfield Operations, Inc. Reg. Ent. Ref. No. RN100695758 Facility/Site Region 14-Corpus Christi Major/Minor Source Minor **CASE INFORMATION** Enf./Case ID No. 47595 No. of Violations Order Type 1660 Docket No. 2013-1700-MLM-E Media Program(s) Used Oil Government/Non-Profit No Multi-Media Water Quality Enf. Coordinator Jorge Ibarra, P.E. EC's Team Enforcement Team 3 Admin. Penalty \$ Limit Minimum Maximum \$5,000 Penalty Calculation Section TOTAL BASE PENALTY (Sum of violation base penalties) \$250 Subtotal 1 ADJUSTMENTS (+/-) TO SUBTOTAL 1 Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage Compliance History Subtotals 2, 3, & 7 -\$25 -10.0% Enhancement Notes Reduction for High Performer classification. 0.0% Enhancement Subtotal 4 Culpability No \$0 The Respondent does not meet the culpability criteria. Notes Good Faith Effort to Comply Total Adjustments Subtotal 5 \$62 0.0% Enhancement\* \$0 Subtotal 6 **Economic Benefit** Total EB Amounts \$0 \*Capped at the Total EB \$ Amount Approx. Cost of Compliance SUM OF SUBTOTALS 1-7 \$163 OTHER FACTORS AS JUSTICE MAY REQUIRE 0.0% Adjustment Reduces or enhances the Final Subtotal by the indicated percentage. Notes Final Penalty Amount \$163 STATUTORY LIMIT ADJUSTMENT Final Assessed Penalty \$163 Reduction Adjustment -\$32 20.0% Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.) Deferral offered for expedited settlement. Notes

\$131

PAYABLE PENALTY

Policy Revision 3 (September 2011)

PCW Revision August 3, 2011

Screening Date 6-Sep-2013

**Docket No.** 2013-1700-MLM-E

Respondent Baker Hughes Oilfield Operations, Inc.

**Case ID No.** 47595

Reg. Ent. Reference No. RN100695758 Media [Statute] Used Oil

Enf. Coordinator Jorge Ibarra, P.E.

Component	Number of	Enter Number Here	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action ( <i>number of NOVs meeting criteria</i> )	0	0%
	Other written NOVs	0	0%
	Any agreed final enforcement orders containing a denial of liability ( <i>number of orders meeting criteria</i> )	0	0%
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria)		0%
and Consent Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government ( <i>number of counts</i> )	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)		0%
Audits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)		0%
	PI	ease Enter Yes or No	T
	Environmental management systems in place for one year or more	No	0%
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%
	Adjustment Pe	rcentage (Sub	total 2
peat Violator (	Subtotal 3)		
No	Adjustment Pe	rcentage (Sub	total 3
mpliance Histo	ory Person Classification (Subtotal 7)		
High Per	former Adjustment Pe	rcentage (Sub	total 7
mpliance Histo	ory Summary		
Compliance History	Reduction for High Performer classification.		

Screening Date	·	PCW
		Policy Revision 3 (September 2011)
Case ID No.		PCW Revision August 3, 2011
Reg. Ent. Reference No.		
Media [Statute]		
Enf. Coordinator Violation Number	Jorge Ibarra, P.E.	
		1
Rule Cite(s)	30 Tex. Admin. Code § 324.1 and 40 Code of Federal Regulations § 279.2	2(c)(1)
Violation Description	Failed to label or clearly mark containers and above ground storage tanks store used oil with the words "Used Oil". Specifically, a storage tank in the station area storing used oil was labeled "Waste Oil".	
	Base	Penalty \$5,000
>> Environmental, Proper	ty and Human Health Matrix	,
Release	<b>Harm</b> Major Moderate Minor	
OR Actual		·
Potential	Percent 0.0%	nondenstead
>>Programmatic Matrix Falsification	Major Moderate Minor	and the second s
Faisincation	x Percent 5.0%	
<u> </u>		
Matrix Notes	100% of the rule requirement was not met.	
Notes		
***************************************		
-	Adjustment	\$4,750
		\$250
Violation Events		
Number of \	/iolation Events 1 Number of violation da	avs
Number of V	Total of Events 1	4,5
	daily	
	weekly	
mark only one	monthly	+250
with an x	quarterly Violation Base	Penalty \$250
	semiannual annual	·
	single event x	· · · · · ·
J		ANNI PARA PARA PARA PARA PARA PARA PARA PAR
	One single event is recommended.	NAME OF THE PROPERTY OF THE PR
		area area area area area area area area
Good Faith Efforts to Com	ply 25.0% Reduction	\$62
	Before NOV NOV to EDPRP/Settlement Offer	33888888888888
	Extraordinary Extraordinary	
	Ordinary x	www.
	N/A (mark with x)	·
	Notes The Respondent achieved compliance by May 31, 2013.	
	Notes The Respondent achieved compliance by May 31, 2013.	
	Violation S	Subtotal \$188
e	this violation Statutory Limit 1	To-t
Economic Benefit (EB) for	tins violation statutory Limit	I COL
Estimate	ed EB Amount \$0 Violation Final Penal	ty Total \$163
	have a second and	
	This violation Final Assessed Penalty (adjusted for	r limits) \$163

g. Ent. Reference No. Media Violation No.	Used Oil					Percent Interest	Years of Depreciation
violation ivo.	1					5.0	1
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description							
				170-100-100-100			
Delayed Costs	<del></del>	7		10.00	\$0	\$0	\$0
Equipment Buildings				0.00	\$0 \$0	\$0	\$0 \$0
Other (as needed)		<del> </del>		0.00	\$0 \$0	\$0 \$0	\$0 \$0
Engineering/construction				0.00	\$0 \$0	\$0	\$0 \$0
Land				0.00	\$0	n/a	\$0
Record Keeping System		1		0.00	\$0	n/a	\$0
Training/Sampling			<del> </del>	0.00	\$0	n/a	\$0
				0.00	\$0	n/a	\$0
Remediation/Disposal	ľ	B H	the second secon				ΨV · · ·
Remediation/Disposal Permit Costs				0.00	\$0	n/a	\$0 \$0
Permit Costs Other (as needed)	\$75 Estimated o	31-May-2013		0.00	\$0 \$0	n/a n/a	\$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs	Estimated c	ost to properly lat investig	pel or clearly ma ation date and	0.00 0.00 ark con the fina	\$0 \$0 tainers used to sto I date is the comp	n/a n/a ore used oil. Date re liance date.	\$0 \$0 equired is the
Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs	Estimated c	ost to properly lat investig	pel or clearly ma ation date and	0.00 0.00 ark con the fina	\$0 \$0 tainers used to sto I date is the comp	n/a n/a ore used oil. Date re liance date. for one-time avoid	\$0 \$0 equired is the
Permit Costs Other (as needed) Notes for DELAYED costs	Estimated c	ost to properly lat investig	pel or clearly ma ation date and	0.00 0.00 ark con the fina entering	\$0 \$0 tainers used to sto I date is the comp ng item (except \$0	n/a n/a  pre used oil. Date re diance date.  for one-time avoid	\$0 \$0 equired is the led costs)
Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs  Disposal Personnel	Estimated c	ost to properly lat investig	pel or clearly ma ation date and	0.00 0.00 ark con the fina	\$0 \$0 tainers used to sto I date is the comp	n/a n/a ore used oil. Date re liance date. for one-time avoid	\$0 \$0 equired is the
Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel	Estimated c	ost to properly lat investig	pel or clearly ma ation date and	0.00 0.00 ark con the fina enterir 0.00 0.00	\$0 \$0 tainers used to sto I date is the comp ng item (except \$0 \$0	n/a n/a n/a  pre used oil. Date re liance date.  for one-time avoid \$0 \$0	\$0 \$0 equired is the led costs) \$0 \$0
Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Dection/Reporting/Sampling	Estimated c	ost to properly lat investig	pel or clearly ma ation date and	0.00 0.00 ark con the fina enterii 0.00 0.00	\$0 \$0 tainers used to sto il date is the comp ng item (except \$0 \$0 \$0	n/a n/a  pre used oil. Date re liance date.  for one-time avoid \$0 \$0 \$0 \$0	\$0 \$0 equired is the led costs) \$0 \$0 \$0
Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Dection/Reporting/Sampling Supplies/equipment	Estimated c	ost to properly lat investig	pel or clearly ma ation date and	0.00 0.00 ark con the fina enterir 0.00 0.00 0.00 0.00 0.00	\$0 \$0 tainers used to sto I date is the comp ig item (except \$0 \$0 \$0 \$0 \$0	for one-time avoid  \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 equired is the led costs) \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Pection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimated c	ost to properly lat investig	pel or clearly ma ation date and	0.00 0.00 ark con the fina enteria 0.00 0.00 0.00 0.00	\$0 \$0 tainers used to sto I date is the comp item (except \$0 \$0 \$0 \$0	ry/a n/a n/a  ore used oil. Date re iliance date.  for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 equired is the ded costs) \$0 \$0 \$0 \$0 \$0



# Compliance History Report

Customer, Respondent, or Owner/Operator:	- CN600290134, Baker Hugh Operations, Inc.	es Oilfield	Classification: H	IGH	Rating:	0.07
Regulated Entity:	RN100695758, BAKER HUG ALICE PRESSURE PUMPING		Classification: H	IGH	Rating:	0.00
Complexity Points:	6		Repeat Violator:	NO		
CH Group:	14 - Other		-			
Location:	2001 HARKINS IN ALICE, J	IM WELLS COUN	TY, TEXAS			
TCEQ Region:	REGION 14 - CORPUS CHRI	ISTI				
ID Number(s): POLLUTION PREVENTION PL STORMWATER PERMIT TXR05/ INDUSTRIAL AND HAZARDO	AO55 US WASTE SOLID WASTE	7350 <b>INDL</b> TXD1	ROLEUM STORAGE TAN 3 JSTRIAL AND HAZARD 48730997 NEW SOURCE PERMIT	OUS WASTE	EPA ID	ION
REGISTRATION # (SWR) 37583  Compliance History Period		o August 31, 201	.3 Rating Year:	2013	Rating Date:	09/01/2013
Date Compliance History		September 12, 2			_	
Agency Decision Requiring	-	Enforceme	nt			
Component Period Selecte	ed: September 12, 200	8 to September	12, 2013			
TCEQ Staff Member to Cor	ntact for Additional Inf	formation Reg	arding This Compli	ance Histor	<b>'y.</b>	
Name: Jorge Ibarra, P.E				817) 588-5890		
Site and Owner/Opera		II 6	liana anii 47		VEC	
<ol> <li>Has the site been in existence</li> <li>Has there been a (known) cha</li> </ol>	·				YES YES	
3) If <b>YES</b> for #2, who is the curi		Baker Hughes	s Oilfield Operations, Incompany, U.S.A. OWNER	. OWNER OPER		2011
4) If <b>YES</b> for #2, who was/were owner(s)/operator(s)?	the prior	BJ Services C	ompany USA, LP, OWNE	R OPERATOR,	9/13/2000 to 7/11	l/2011
5) If <b>YES</b> , when did the change occur?	e(s) in owner or operator	7/11/2011				
Components (Multimed			ctions A - J			
A. Final Orders, court jud  N/A	Igments, and consent	decrees:				

**B.** Criminal convictions:

N/A

C. Chronic excessive emissions events:

D. The approval dates of investigations (CCEDS Inv. Track. No.):

E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):

	of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulat	ed
entity.	A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.	

N/A

## F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

**Sites Outside of Texas:** 

N/A

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN	§	BEFORE THE
ENFORCEMENT ACTION	§	
CONCERNING	§	
BAKER HUGHES OILFIELD	§	TEXAS COMMISSION ON
OPERATIONS, INC.	§	
RN100695758	§	ENVIRONMENTAL QUALITY

## AGREED ORDER DOCKET NO. 2013-1700-MLM-E

## I. JURISDICTION AND STIPULATIONS

- 1. The Respondent owns and operates a facility that provides services for the oil and gas exploration industry located at 2001 Harkins in Alice, Jim Wells County, Texas (the "Facility").
- 2. The Facility involves or involved the management of industrial solid waste and/or industrial hazardous waste as defined in Tex. Health & Safety Code ch. 361.
- 3. The Facility involves or involved the management of used oil as defined in Tex. Health & Safety Code ch. 371, and adjoins, is contiguous with, surrounds, or is near or adjacent to water in the state as defined in Tex. Water Code § 26.001(5).
- 4. The Executive Director and the Respondent agree that the Commission has jurisdiction to enter this Agreed Order, and that the Respondent is subject to the Commission's iurisdiction.
- 5. The Respondent received notice of the violations alleged in Section II ("Allegations") on or about September 2, 2013.

- 6. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
- 7. An administrative penalty in the amount of Eight Thousand Six Hundred Twenty-Five Dollars (\$8,625) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent has paid Six Thousand Nine Hundred One Dollars (\$6,901) of the administrative penalty and One Thousand Seven Hundred Twenty-Four Dollars (\$1,724) is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Agreed Order. The deferred amount will be waived upon full compliance with the terms of this Agreed Order. If the Respondent fails to timely and satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require the Respondent to pay all or part of the deferred penalty.
- 8. Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.
- 9. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 Tex. ADMIN. CODE § 70.10(a).
- 10. The Executive Director recognizes that the Respondent has implemented the following corrective measures at the Facility:
  - a. By January 31, 2013, began collecting samples for hazardous metals monitoring;
  - b. By May 31, 2013:
    - i. Properly marked containers used to store used oil; and
    - ii. Began maintaining and including records of quarterly visual monitoring in the Storm Water Pollution Prevention Plan ("SWP3").
  - c. By June 21, 2013:
    - i. Signed and certified the SWP3;
    - ii. Developed a complete drainage area site map;
    - iii. Implemented all necessary pollution prevention practices;
    - iv. Began documenting routine facility inspections;
    - v. Began monitoring the rain gauge a minimum of once per week and once per day during storm events; and
    - vi. Began conducting the comprehensive site compliance inspections at least once each permit year.

- d. By August 1, 2013:
  - i. Began maintaining records of all hazardous and industrial solid waste activities;
  - ii. Conducted and certified a survey of potential non-stormwater sources; and
  - iii. Ceased the unauthorized disposal of industrial solid waste generated at the Facility.
- e. By August 5, 2013, conducted a hazardous waste determination on all wastes generated at the Facility and began maintaining the required documentation.
- f. By September 16, 2013, provided the required updated Notice of Registration ("NOR") to the Executive Director.
- 11. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Agreed Order.
- 12. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
- 13. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable.

## II. ALLEGATIONS

As owner and operator of the Facility, the Respondent is alleged to have:

- 1. Failed to provide notice to the Executive Director in writing or using electronic notification software provided by the Executive Director, of any such changes or additional information to that reported previously within 90 days of the occurrence of such change or of becoming aware of such additional information, in violation of 30 Tex. Admin. Code § 335.6(c), as documented during an investigation conducted on May 31, 2013. Specifically, the NOR primary contact, company name, site name, owner name, and billing contact were in need of updating. Additionally, the hazardous waste streams were missing from the NOR, solid waste management units managing hazardous waste were listed active when inactive or were completely missing, and the units listed did not reflect the waste actively managed in the units.
- 2. Failed to keep records of all hazardous and industrial solid waste activities regarding the quantities generated, stored, processed, and disposed of on-site or shipped off-site for storage, processing, or disposal, in violation of 30 Tex. Admin. Code § 335.9(a)(1), as documented during an investigation conducted on May 31, 2013. Specifically, the Respondent failed to maintain the quantity of waste generated; the quantity of waste held

in on-site storage as of December 31st of each year; the method of storage, processing, or disposal; and the quantity of waste shipped off-site for storage, processing, or disposal for each calendar year, including the name, address, and location of each off-site facility and transporter receiving the shipments.

- 3. Failed to sign and certify the SWP3 in accordance with Part III, Section E.6.(c), in violation of 30 Tex. Admin. Code § 305.125(1) and Texas Pollutant Discharge Elimination System ("TPDES") Multi-Sector General Permit No. TXR05AO55, Part III, General SWP3 Requirements, Section A.1., as documented during an investigation conducted on May 31, 2013.
- 4. Failed to conduct and certify a survey of potential non-stormwater sources within 180 days of filing a notice of intent ("NOI") in accordance with Part III, Section B.1.(c), in violation of 30 Tex. Admin. Code § 305.125(1) and TPDES Multi-Sector General Permit No. TXR05AO55, Part III, Inspection and Certification of Non-Storm Water Discharges, Section B.1.(b), as documented during an investigation conducted on May 31, 2013.
- 5. Failed to develop a complete drainage area site map which depicts all items listed in the TPDES General Permit, in violation of 30 Tex. Admin. Code § 305.125(1) and TPDES Multi-Sector General Permit No. TXR05A055, Part III, Description of Potential Pollutants and Sources, Section A.3.(d), as documented during an investigation conducted on May 31, 2013. Specifically, the site map did not include stormwater outfalls observed along the north fence-line and the square footage of the Facility was not listed on the map nor was a clear scale provided to determine the approximate surface area.
- 6. Failed to implement all pollution prevention practices determined to be necessary, reasonable, and effective by the stormwater pollution prevention team and to prevent the discharge of industrial waste into or adjacent to water in the state, in violation of 30 Tex. ADMIN. CODE § 305.125(1) and TPDES Multi-Sector General Permit No. TXR05AO55, Part III, Pollution Prevention Measures and Controls, Section A.4., and Tex. Water Code § 26.121(a)(2), as documented during an investigation conducted on May 31, 2013. Specifically, an earthen berm was not present at the fueling area, there were numerous soil stains at the truck and equipment parking and storage area and the absorbent socks were degraded and/or missing, a leaking tote was also observed in the product storage area, there were multiple spills to concrete and soils around the test pad area, and the wash bay structural controls were not present.
- 7. Failed to document routine facility inspections, in violation of 30 Tex. ADMIN. CODE § 305.125(1) and TPDES Multi-Sector General Permit No. TXR05AO55, Part III, Routine Facility Inspections, Section B.2.(c), as documented during an investigation conducted on May 31, 2013. Specifically, routine inspections did not include the date and time, weather information, and any previously unidentified discharges of pollutants from the Facility.
- 8. Failed to maintain and include in the SWP3 records of quarterly visual monitoring, in violation of 30 Tex. Admin. Code § 305.125(1) and TPDES Multi-Sector General Permit No. TXR05A055, Part III, Quarterly Visual Monitoring, Section B.3.(c), as documented

- during an investigation conducted on May 31, 2013. Specifically, only the most recent quarterly visual monitoring record was available for review.
- 9. Failed to inspect the rain gauge a minimum of once per week and once per day during storm events, in violation of 30 Tex. ADMIN. CODE § 305.125(1) and TPDES Multi-Sector General Permit No. TXR05AO55, Part III, Qualifying Storm Events, Section D.1.(c), as documented during an investigation conducted on May 31, 2013.
- Failed to conduct the comprehensive site compliance inspection at least once each permit year, in violation of 30 Tex. Admin. Code § 305.125(1) and TPDES Multi-Sector General Permit No. TXR05A055, Part III, Annual Comprehensive Site Compliance Inspection, Section B.5.(a), as documented during an investigation conducted on May 31, 2013.
- 11. Failed to conduct the hazardous metals monitoring prior to December 31st for each annual monitoring period, in violation of 30 Tex. Admin. Code § 305.125(1) and TPDES Multi-Sector General Permit No. TXR05A055, Part III, Discharges of Storm Water Runoff, Section C.1.(b), as documented during an investigation conducted on May 31, 2013. Specifically, the annual metals monitoring for calendar year 2012 was done in January 2013.
- 12. Failed to prevent the unauthorized disposal of industrial solid waste without the written authorization of the Commission, in violation of 30 Tex. Admin. Code § 335.4, as documented during an investigation conducted on May 31, 2013. Specifically, at least 110,796 gallons (2,638 barrels) of wastewater ("dirty water", "sump pit" liquids, "gel water", and "gelled water") was generated at the Baker Hughes Alice facility and transported and disposed of by Mo-Vac Services to a Railroad Commission permitted disposal pit (RRC Pit Permit No. P0077961C) located in Alice, Texas between 2012-2013.
- Failed to conduct a hazardous waste determination on the solid waste generated at the Facility pursuant to 30 Tex. Admin. Code § 335.504 (relating to Hazardous Waste Determination), in violation of 30 Tex. Admin. Code §§ 335.62 and 335.513 and 40 Code OF Federal Regulations ("CFR") § 262.11, as documented during an investigation conducted on May 31, 2013.
- 14. Failed to label or clearly mark containers and above ground storage tanks used to store used oil with the words "Used Oil", in violation of 30 Tex. ADMIN. CODE § 324.1 and 40 CFR § 279.22(c)(1). Specifically, a storage tank in the fueling station area storing used oil was labeled "Waste Oil".

## III. DENIALS

The Respondent generally denies each allegation in Section II ("Allegations").

## IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that the Respondent pay an administrative penalty as set forth in Section I, Paragraph 7 above. The payment of this administrative penalty and the Respondent's compliance with all the terms and conditions set forth in this Agreed Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Baker Hughes Oilfield Operations, Inc., Docket No. 2013-1700-MLM-E" to:

Financial Administration Division, Revenue Operations Section Attention: Cashier's Office, MC 214 Texas Commission on Environmental Quality P.O. Box 13088 Austin, Texas 78711-3088

- 2. The provisions of this Agreed Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Facility operations referenced in this Agreed Order.
- 3. This Agreed Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
- This Agreed Order may be executed in separate and multiple counterparts, which 4. together shall constitute a single instrument. Any page of this Agreed Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Agreed Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms "electronic transmission", "owner", "person", "writing", and "written" shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.
- 5. Under 30 Tex. Admin. Code § 70.10(b), the effective date is the date of hand-delivery of the Order to the Respondent, or three days after the date on which the Commission mails notice of the Order to the Respondent, whichever is earlier.

Baker Hughes Oilfield Operations, Inc. DOCKET NO. 2013-1700-MLM-E Page 7

For the Commission

## SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Porm Name For the Executive Director	(e/22   15 Date
I, the undersigned, have read and understand the attagree to the attached Agreed Order on behalf of the do agree to the terms and conditions specified therein accepting payment for the penalty amount, is material	entity indicated below my signature, and I . I further acknowledge that the TCEQ, in
<ul> <li>I also understand that failure to comply with the Cand/or failure to timely pay the penalty amount, may an anomalise impact on compliance history;</li> <li>A negative impact on compliance history;</li> <li>Greater scrutiny of any permit applications subto Referral of this case to the Attorney General additional penalties, and/or attorney fees, or to Increased penalties in any future enforcement and Automatic referral to the Attorney General's Cand</li> <li>TCEQ seeking other relief as authorized by law. In addition, any falsification of any compliance documents.</li> </ul>	result in: omitted; l's Office for contempt, injunctive relief, o a collection agency; actions; Office of any future enforcement actions;
Signature	1-3-2014 Date
Richard Vaclavik  Name (Printed or typed) Authorized Representative of Baker Hughes Oilfield Operations, Inc.	V.P. U.S. Pressure Pumping Title

**Instructions:** Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Section W, Paragraph 1 of this Agreed Order.